

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Misc. No. 17-151-LPS

**STIPULATION AND [PROPOSED] ORDER PERMITTING  
COUNSEL FOR INTERVENOR BONDHOLDERS TO REVIEW  
PROPOSED SALE PROCEDURES ORDER AND THE RELATED  
SPECIAL MASTER’S REPORT AND RECOMMENDATION**

WHEREAS, on August 9, 2021, the Proposed Sale Procedures Order, D.I. 302, and the Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, D.I. 303, were filed under seal;

WHEREAS, the Court has recognized that the Intervenor Bondholders, should they wish to do so, may file objections to the Proposed Sale Procedures Order, D.I. 290, at 6; D.I. 299; and

WHEREAS, counsel for the Intervenor Bondholders at Paul, Weiss, Rifkind, Wharton & Garrison, LLP (“Paul, Weiss”), have conferred concerning arrangements for access by Paul, Weiss to those filings with counsel for the Special Master and counsel for the undersigned parties and nonparties;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

1. The following documents will be made available to counsel for the Intervenor Bondholders at Paul, Weiss: (a) a copy of the Proposed Sale Procedures Order, D.I. 302, to be provided with no redactions; and (b) a copy of the Special Master’s Report and Recommendation

Regarding Proposed Sale Procedures Order, D.I. 303, to be provided with redactions of material containing or derived from information designated “Highly Confidential” by Crystallex and the Venezuela Parties pursuant to the Special Master Confidentiality Order, D.I. 291.

2. Counsel for the Intervenor Bondholders at Paul, Weiss shall not disclose the contents of the documents described in paragraph 1 hereof to any other person, including the Intervenor Bondholders themselves, in the absence of a further order by this Court permitting such disclosure.

Dated: August 13, 2021

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IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
The Honorable Leonard P. Stark  
United States District Judge